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HARRIS,  
WILTSHIRE &  
GRANNIS LLP

EX PARTE OR LATE FILED

1200 EIGHTEENTH STREET, NW  
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301  
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

February 11, 2000

**Via Hand Delivery**

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Twelfth Street Lobby, TW-A325  
Washington, D.C. 20554

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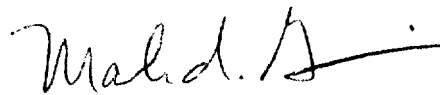
**Re: *Redesignation of the 17.7-19.7 GHz Band, IB 98-172***

Dear Ms. Salas:

Earlier this afternoon I spoke by telephone with Adam Krinsky of Commissioner Tristani's office regarding the above-captioned proceeding. In the conversation, I told Mr. Krinsky about a journal article in which three economists examine the economic efficiency of the Emerging Technologies relocation rules. Teledesic cited the article in its comments in this proceeding. In particular, I directed Mr. Krinsky's attention to pages 668-69 of the article, which discuss evidence that the Emerging Technologies rules fostered attempts by some incumbents to obtain overcompensation for relocated links. A copy is attached. I also discussed with Mr. Krinsky the reasons why one would expect very little evidence on this subject to wind up in the record. In the course of the discussion, I also reiterated Teledesic's very strong views on this subject, which are otherwise contained in Teledesic's pleadings to date.

In accordance with section 1.1206(b) of the Commission's rules, I am submitting an original and 1 copy of this letter and the attachment. If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely



Mark A. Grannis

cc: Adam Krinsky

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*One copy of the Oct. '98 issue of  
'The Journal of Law & Economics'.*